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9 Attorneys for Plaintiffs ROSAURA DERAS,
10 ALEXANDER SANTIAGO, and MARIA ELENA
11 SANTIAGO, individually and on behalf of a class of
similarly situated individuals

12
13 **UNITED STATES DISTRICT COURT**
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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16 ROSAURA DERAS, ALEXANDER
17 SANTIAGO, and MARIA ELENA SANTIAGO,
18 individually and on behalf of a class of similarly
situated individuals,

Case No.: 4:17-cv-05452 (JST)(TSH)

Hon. Jon S. Tigar

19 Plaintiffs,
20 v.
21 VOLKSWAGEN GROUP OF AMERICA, INC.,
22 Defendant.
23

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

24 Plaintiffs Rosaura Deras, Alexander Santiago and Maria Elena Santiago (“Plaintiffs”), and
25 Defendant Volkswagen Group of America, Inc. (“VWGoA” or “Defendant”), pursuant to the
26 Court’s June 12, 2020 Order, hereby respectfully submit the following Joint Case Management
27 Conference Statement. The phone number for the September 23, 2020 telephone conference is
28

1 (866) 384-1728; passcode: 2124718466.

2 **1. STATUS OF PROPOUNDED DISCOVERY**

3 Plaintiffs have served three sets each of Requests for Production of Documents and
4 Interrogatories. VWGoA has responded to the first two sets, and has provided supplemental
5 responses to the first request to produce and to the first set of interrogatories.

6 VWGoA has served one set of Requests for Production of Documents, and one set of
7 Interrogatories. Plaintiffs have responded to VWGoA's requests for documents, and have provided
8 supplemental interrogatory answers. VWGoA has conducted an inspection of Plaintiff Santiago's
9 vehicle, and the sunroof assembly from that vehicle has been removed and is being preserved
10 jointly by Plaintiffs and Defendant.

11 There are no pending discovery disputes at this time.

12 **2. OTHER ISSUES BEARING ON THE PROGRESS OF THE CASE**

13 The parties are not aware of any other issues at this time requiring the Court's attention.

14 Dated: September 23, 2020

15 THE LAW OFFICE OF STEPHEN M. HARRIS, P.C.

16
17 By: /S/ Stephen M. Harris
18 Stephen M. Harris
19 Attorneys for Plaintiffs
20 ROSAURA DERAS, ALEXANDER
21 SANTIAGO, and MARIA ELENA
SANTIAGO, individually, and on
behalf of a class of similarly situated
individuals

22 Dated: September 23, 2020

23 HERZFELD & RUBIN, P.C.

24 By: /S/ Brian T. Carr
25 Michael B. Gallub
26 Homer B. Ramsey
27 Brian T. Carr
28 (Admitted Pro Hac Vice)
Attorneys for Defendant
VOLKSWAGEN GROUP OF AMERICA,
INC.

1 **Certification of Compliance with N.D. Cal. L.R. 5-1(i)(3) and General Order 45, Section X**

2 The filing attorney hereby certifies that concurrence in the filing of the document has
3 been obtained from each signatory, in accordance with N.D. Cal. Local Rule 5-1(i)(3) and
4 N.D. Cal. Gen. Order 45, Sec. X(B).

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